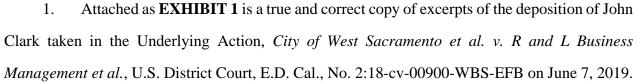
1 2 3 4 5	Bret A. Stone SBN 190161 BStone@Paladin Brian R. Paget SBN 168694 BPaget@Paladin Melanie A. Mariotti SBN 309000 MMariotti@Pala PALADIN LAW GROUP® LLP 220 W. Gutierrez Street Santa Barbara, CA 93101 Telephone: (805) 898-9700 Facsimile: (805) 852-2495  Special Assistant City Attorneys	Law.com
6	for the City of West Sacramento	
7	Counsel for City of West Sacramento	
8		
9	UNITED STATES DISTRICT COURT	
10	FOR THE EASTERN DISTRICT OF CALIFORNIA	
11		
12 13	ARROWOOD INDEMNITY COMPANY, a Delaware corporation, formerly known as ROYAL INSURANCE COMPANY OF	Case No. 2:21-CV-00397-WBS-JDP DECLARATION OF BRET A. STONE IN
14	AMERICA, and successor to ROYAL GLOBE INSURANCE COMPANY,	SUPPORT OF CITY OF WEST
15	Plaintiff,	SACRAMENTO'S OPPOSITION TO ARROWOOD'S MOTION FOR SUMMARY JUDGMENT OR, IN THE ALTERNATIVE,
16	v.	PARTIAL SUMMARY JUDGMENT
17	CITY OF WEST SACRAMENTO; and ROES 1-50, inclusive,	Hon. William B. Shubb
18	Defendant.	
19		
20 21	AND RELATED COUNTER-CLAIM	
22   23	I, Bret A. Stone, hereby declare as follows:	
24	I am an attorney in good standing, and am	licensed to practice law in all of the courts in the
25	State of California. I am a partner with the law fire	rm of Paladin Law Group® LLP, which represents
26	The City of West Sacramento in this litigation.	As a result of my work on Defendants' behalf,
27	have personal knowledge of the matters stated herein and could and would competently testify	
20	thereto if called upon to do so.	





- 2. Attached as **EXHIBIT 2** is a true and correct copy of excerpts of the deposition of John Clark taken in the Underlying Action, on August 7, 2020.
- 3. Attached as **EXHIBIT 3** is a true and correct copy of excerpts of the deposition of John Clark taken in this action, on August 4, 2021.
- 4. Attached as **EXHIBIT 4** is a true and correct copy of excerpts of the deposition of John Clark taken in this action, on September 3, 2021.
- 5. Attached as **EXHIBIT 5** is a true and correct copy of excerpts of the deposition of Richard Leland taken in the Underlying Action, on June 6, 2019.
- 6. Attached as **EXHIBIT 6** is a true and correct copy of excerpts of the deposition of Richard Leland taken in the Underlying Action, on August 7, 2020.
- 7. Attached as **EXHIBIT 7** is a true and correct copy of excerpts of the deposition of Richard Leland taken in the Underlying Action, on August 8, 2020.
- 8. Attached as **EXHIBIT 8** is a true and correct copy of excerpts of the deposition of Robert Bennett taken in this action, on July 28, 2021.
- 9. Attached as **EXHIBIT 9** is a true and correct copy of Anne Farr's expert report dated October 4, 2021.
- 10. Attached as **EXHIBIT 10** is a true and correct copy of Anne Farr's expert rebuttal report dated October 18, 2021.
  - 11. Exhibit 11 is purposely left blank.
  - 12. Exhibit 12 is purposely left blank.
- 13. Attached as **EXHIBIT 13** is a true and correct copy of excerpts of the deposition of Anne Farr taken in this action, on November 5, 2021.
- 14. Attached as **EXHIBIT 14** is a true and correct copy of the Evidentiary Hearing Transcript from Day 1 taken in the Underlying Action dated August 25, 2020.



1	15. Attached as <b>EXHIBIT 15</b> is a true and correct copy of the Evidentiary Hearing		
2	Transcript from Day 2 taken in the Underlying Action dated August 26, 2020.		
3	16. Attached as <b>EXHIBIT 16</b> is a true and correct copy of the Evidentiary Hearing		
4	Transcript from Day 3 taken in the Underlying Action dated August 27, 2020.		
5	17. Attached as <b>EXHIBIT 17</b> is a true and correct copy of excerpts of Thomas Delfino's		
6	deposition taken on November 4, 2021.		
7	18. Attached as <b>EXHIBIT 18</b> is a true and correct copy of Photos from May 2, 1986 DTSC		
8	Inspection.		
9	I declare under penalty of perjury under the laws of the State of California that the foregoing		
10	is true and correct.		
11	Executed this 29th day of November 2021 in the County of Santa Barbara.		
12	/s/Bret A. Stone		
13	Bret A. Stone		
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